REMOVAL ACTION PLAN DRUM & WASTE STABILIZATION OF DRUM CLUSTER UNNAMED TRIBUTARY OF THE BOUND BROOK AND REAR EMBANKMENT CORNELL-DUBILIER ELECTRONICS SUPERFUND SITE SOUTH PLAINFIELD, NEW JERSEY

The following procedures have been developed by Oxford Environmental, Inc. (OE) to address the discovery of a cluster of approximately twelve (12) drums on the embankment and in the bound brook. These procedures shall be implemented to ensure personnel safety during drum and waste stabilization activities. Field procedures may be revised to fit actual site conditions.

PRELIMINARY ACTIVITIES:

- OE's HSO shall conduct a hazard assessment for each phase of the work (i.e. preliminary activities, water removal activities, and land removal activities).
- A site safety orientation shall be conducted following the completion of the hazard assessment.
- OE personnel (including subcontractor personnel) will conduct a preliminary site reconnaissance and physical inventory of drums and waste debris for stabilization.
- Drums shall be labeled and documented in a field logbook with a unique identification number and photographed of its location.
- All drums and over packs will be deemed as containing hazardous waste until proper characterization has been performed.

REMOVAL ACTIVITIES (WATER)

Water removal activities shall NOT take place if the following condition exist:

- Rapidly moving water (bobber moves at a rate of more than 6" per minute or as determined by HSO).
- Drum is completely submerged (i.e. less than 6" exposed).
- OE personnel will attach choker to top exposed section of drum is a stable bottom exists and water around the drum does not exceed personnel's mid-calf level.

If water level exceeds employees' mid calf-level or footing is not solid, removal activities shall be performed using suitable flat bottom boat or platform.

REMOVAL ACTIVITIES (LAND)

- All drums identified for removal shall be over packed to ensure that its contents do not leak and pose a threat to worker health, safety and the environment.
- Visibly stained soils and contaminated waste debris materials will also be removed and placed into drums for characterization and disposal.
- All drum inventory information collected during preliminary activities shall be transferred to the outside of the over pack drum.

HEALTH & SAFETY

- All personnel within 15 feet of the shoreline or working on water must don a PFD (personal floatation device).
- All personnel entering or working in the water must be tied off to a attended tether line.
- In addition to the above requirements, personnel protective equipment used shall be in accordance with the HASP for Drum Stabilization.